

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

No.

05cr 10098 NG

v.

VIOLATION:

18 U.S.C. § 371 -

Conspiracy to Defraud
the United States

1. KAREN WOO,

Defendant.

INFORMATION

COUNT ONE: (18 U.S.C. § 371 - Conspiracy to Defraud the
United States)

The United States Attorney charges that:

From a date unknown, but no later than November, 2000, and continuing until in or about November, 2003, at Boston and elsewhere, in the District of Massachusetts,

1. KAREN WOO

defendant herein, knowingly and willfully conspired and agreed with Douglas Bannerman, and with other persons both known and unknown to the grand jury, to defraud an agency of the United States, to wit, the Internal Revenue Service, in its attempt to ascertain, compute, assess, and/or collect federal income taxes.

Woo and Bannerman furthered this agreement by: engaging in a scheme in which Karen Woo and Douglas Bannerman both (1) claimed that checks written by Karen Woo on a weekly basis on the Woo Design Account, which purported to be checks paid in exchange for business services, constituted valid business expenses deductible

by Woo Design, knowing that those checks were not paid in exchange for any business services rendered; (2) submitted to a tax preparer that the payment of those moneys was a deductible business expense, thus causing the preparation of tax returns that claimed those payments as tax-deductible; and (3) submitted those returns to the Internal Revenue Service, knowing that they contained false claims regarding the applicable tax liability.

MICHAEL J. SULLIVAN
United States Attorney

By:


RACHEL E. HERSHFANG
Assistant U.S. Attorney

Dated: April 7, 2005

Criminal Case Cover Sheet **CR 10098 NG** **U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency DEACity Newton**Related Case Information:**County Middlesex

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name Karen Woo Juvenile: ☐ Yes ☒ No

Alias Name _____

Address 34 Bolton Rd., Newton, MABirthdate: _____ SS # _____ Sex: F Race: _____ Nationality _____Defense Counsel if known: Frank Libby, 617-338-9300 Address _____

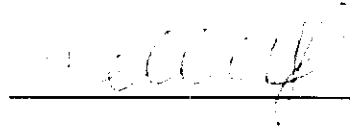
Bar Number _____

U.S. Attorney Information:AUSA Rachel E. Hershfang 617-748-3249 Bar Number if applicable _____Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody**Location Status:**

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by: _____ on _____Charging Document: ☐ Complaint ☒ Information ☐ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: April 7, 2005Signature of AUSA: 

District Court Case Number (To be filled in by deputy clerk):

Name of Defendant Karen Woo

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspiracy to defraud the United States</u>	<u>1</u>
Set 2	<u></u>	<u></u>	<u></u>
Set 3	<u></u>	<u></u>	<u></u>
Set 4	<u></u>	<u></u>	<u></u>
Set 5	<u></u>	<u></u>	<u></u>
Set 6	<u></u>	<u></u>	<u></u>
Set 7	<u></u>	<u></u>	<u></u>
Set 8	<u></u>	<u></u>	<u></u>
Set 9	<u></u>	<u></u>	<u></u>
Set 10	<u></u>	<u></u>	<u></u>
Set 11	<u></u>	<u></u>	<u></u>
Set 12	<u></u>	<u></u>	<u></u>
Set 13	<u></u>	<u></u>	<u></u>
Set 14	<u></u>	<u></u>	<u></u>
Set 15	<u></u>	<u></u>	<u></u>

ADDITIONAL INFORMATION: